

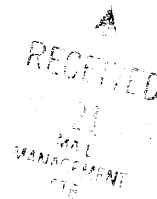


Arizona®
State Parks

July 14, 2003

Section of Environmental Analysis
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423

ET 277
KR
In reply, please refer to:
SHPO-2003-1476



RE: STB/Docket No. AB-441 (Sub-No. 3X)
SWKR Operating Co., Abandonment Exemption, Cochise County, Arizona

Dear Sir or Madam:

We received information from SWKR Operating Co. regarding the above referenced undertaking. I have reviewed the material pursuant to 36 CFR Part 800 and have the following comments:

1. The historic report, which I understand you have a copy of, does not reference a preparer, and it is not clear that it was done by a person meeting the Secretary of the Interior's Professional Standards. Under Item 8 (p. 4) it states that SWKR believes that neither the structures on the Line nor the Line itself are unusual or noteworthy for inclusion on the National Register of Historic Places." The report provides no information about the property other than its location and photographs that I might use to consider this evaluation. In particular, its age and history have not been investigated. Also, there is no mention if there are archaeological resources that might be affected by the undertaking. I request an evaluation of the property be done by a qualified professional(s) that provides information that can be used to determine if the property meets any of the National Register's criteria.
2. If after evaluating the historic significance of the property it is determined eligible for listing in the National Register, the STB should consider additional methods of mitigating the adverse effect of abandonment. This might include preservation of all or parts of the right-of-way as well as track and structures on the Line.
3. Although the photographs in the report can be useful as part of the evaluation process, it should be noted that they do not constitute archival documentation that would be called for if the property is determined eligible and subsequently abandoned. Should the undertaking be approved by STB, documentation pursuant to a Memorandum of Agreement should meet the State Historic Preservation Office's State documentation standards (enclosed).

Janet Napolitano
Governor

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602.542.4188

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If you have any further questions or requests, you may contact me at (602) 542-7159, or by e-mail at wcollins@pr.state.az.us.

Sincerely,

A handwritten signature in black ink that reads "William S. Collins". The script is cursive and fluid, with the first letters of the first and last names being capitalized and prominent.

William S. Collins, Ph.D.
Deputy State Historic Preservation Officer
State Historic Preservation Office

encl.

cc: Louis E. Gitomer
Attorney for the SWKR Operating Co.
Ball Janik LLP.
1455 F Street, N.W., Suite 225
Washington, DC 20005

National and State Historic Preservation Acts
Documentation Standards for Historic Properties

Revised Dec. 2002

The following requirements are set forth pursuant to A.R.S. section 41-861, et seq. and are intended to outline the typical documentation requirement for compliance with the provisions of section 41-863 of the Act. Following guidance issued by the National Park Service, these standards may also be applied in memoranda of agreement by Agencies pursuant to 36 CFR Part 800 as part of mitigation of adverse effects.

When all options for rehabilitation or alternative uses of a structure have been considered and an Agency concludes that it must demolish a building or structure that meets the criteria for the National or Arizona Register of Historic Places, the following documentation will generally be accepted as appropriate mitigation:

1. A narrative that includes the original name and construction date of the building or structure, the architect or builder (if appropriate and known), and a brief discussion of the original function of the building or structure and its uses over time. The narrative should include a statement concerning why the property is perceived as having historic importance. Associations with local or state development, construction by a major program (e.g., WPA), or affiliation with the origins of a state institution are all potential areas of historic significance. For residential properties the name and any potential significance of the original or long-term occupants may be sufficient. Properties notable for their architectural style or method of construction should have a statement to that effect.
2. A map indicating geographic location and contextual relationship of the property to adjacent structures. Buildings in campus or similar group settings should be indicated on a map of the entire complex.
3. Reproductions of any original floorplans and architectural or engineering drawings of the property showing their original appearance and design. An effort should be made to locate these plans in Agency or other archives. If the original drawings cannot be located, a floorplan and simple elevation drawings of the primary exterior facades should be prepared for all major buildings. Major dimensions and a scale should appear on any drawings. The number and extent of drawings required in some situations may be determined by consultation with the State Historic Preservation Officer.
4. A set of 5"x7" black and white photographs and color slides showing all significant facades and architectural detailing, especially along the roofline and around the primary original entrance. Identifying features such as name plaques or cornerstones should be photographed. Significant interior spaces such as lobbies or staircases should be photographed if any noteworthy features exist. One photograph should show the building with its surroundings or its relationship to adjacent buildings, as appropriate. At least one of the black and white elevation photographs should include a measuring stick or ruler to provide scale. All photographs must be labeled on the back with the photographer's name, date of photograph, direction of view, and location. *Note: All photographs must be produced on B&W paper and with B&W processing. Many developers now use color processing on color papers. These are not archivally stable and are not acceptable.* Negatives should be submitted to the State Historic Preservation Office.

The materials described above should be submitted to the State Historic Preservation Office and the Department of Library, Archives and Public Records in a suitable notebook or folder.

NOTE: Early consultation with the SHPO staff is recommended to ensure that all documentation requirements are understood. It is possible that in exceptional cases some additional material will be required.

Prepared by State Historic Preservation Office, Arizona State Parks, 1300 W. Washington, Phoenix, AZ 85007, (602) 542-4009.